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## BY ECF FILING

The Honorable Colleen McMahon United States District Judge United States Court for the Southern District of New York 500 Pearl St. New York, NY 10007-1312

Re:

United States v. Hua Fen Bi

Ind. No: 20-CR-401 (CM)

May 2, 2022
NEMO ENDURSEL

5/3/22

Pretrial is directed to
return defendant 3 U.S. PASSPORT Forthwith.

Piller Mr. Mal

Dear Judge McMahon:

I am counsel to Defendant Hua Fen Bi in the above-referenced case. Mr. Bi was sentenced to time-served with a term of supervised release, which has since elapsed. He has informed me that U.S. Pretrial Services is going to return his U.S. Passport to the issuing agency unless the Court issues an Order directing that it be returned forthwith to Mr. Bi. I contacted Pretrial Services today by telephone and obtained their consent to this request. The government, by AUSA Alexandra Rothman, does not object to this request.

This is my first request for the return of Mr. Bi's passport, and I appreciate Your Honor's consideration.

**USDC SDNY** 

DOCUMENT

**ELECTRONICALLY FILED** 

Respectfully submitted,

/s/ Edward V. Sapone Edward V. Sapone, Esq. Hon. College McMcMon 00401-CM Document 36 Filed 05/03/22 Page 2 of 2 May 2, 202 ase 1:20-cr-00401-CM Document 35 Filed 05/02/22 Page 2 of 2 Page 2

cc: AUSA Jason Swergold (By ECF) AUSA Alexandra Rothman (By ECF) Officer Lea Harmon (By Email)